

1 Rene L. Valladares
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 Aden Kebede
5 Assistant Federal Public Defender
6 411 E. Bonneville, Ste. 250
7 Las Vegas, Nevada 89101
8 (702) 388-6577
9 Aden_Kebede@fd.org

10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**
13

14 United States of America,
15
16 Plaintiff,
17
18 v.
19
20 Javier Encinas,
21
22 Defendant.

Case No. 2:16-CR-00261-RCJ-GWF-1
**Stipulation to Continue
Revocation Hearing (Second
Request)**

23
24
25 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
26 Chiou, Acting United States Attorney, and Kimberly M. Frayn, Assistant United
States Attorney, counsel for the United States of America, and Rene L. Valladares,
Federal Public Defender, and Aden Kebede, Assistant Federal Public Defender,
counsel for Javier Encinas, that the Revocation Hearing currently scheduled on
December 14, 2021 at 10:00 am, be vacated and continued for ninety (90) days.

27
28 This Stipulation is entered into for the following reasons:

29
30 1. Additional time is needed for defense counsel to confer with the
31 defendant regarding a pending plea agreement that will resolve the revocation
32 and underlying charges globally;

2. Mr. Encinas agrees with the need for the continuance.

This is the second request for a continuance of the revocation hearing.

DATED: December 2, 2021.

Rene L. Valladares
Federal Public Defender

Christopher Chiou
Acting United States Attorney

By /s/ Aden Kebede

By /s/ Kimberly Frayn

ADEN KEBEDE
Assistant Federal Public Defender

KIMBERLY FRAYN
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3
4
5 United States of America,
6 Plaintiff,
7 v.
8 Javier Encinas,
9 Defendant.

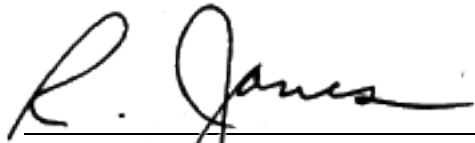
Case No. 2:16-CR-00261-RCJ-GWF-1

**Order Granting Second
Stipulation to Continue
Revocation Hearing**

10
11
12 Based on the stipulation of counsel, the Court finds that good cause exists
13 to continue the revocation hearing.

14 IT IS THEREFORE ORDERED that the revocation hearing currently
15 scheduled for December 14, 2021, at 10:00 a.m. is vacated and continued to
16 Tuesday, 3/22/2022 at 11:00 a.m. before Senior District Judge Robert C. Jones.

17 DATED: December 3, 2021.

18
19 

20 Robert C. Jones
21 United States District Judge
22
23
24
25
26